

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X

In re:

Chapter 13

DANA SMITH,

Case No. 8-15-71331-ast

Debtor.

**APPLICATION**

-----X

TO: **THE HONORABLE ALAN S. TRUST**  
**UNITED STATES BANKRUPTCY JUDGE**

The above-named debtor (the “Debtor”), by her attorneys, Berger, Fischoff & Shumer, LLP, respectfully represents as follows:

1. The Debtor filed her Chapter 13 petition on March 30, 2015, without the following forms Schedule “B”, Schedule “C”, Schedule “G”, Schedule “H”, Schedule “I”, Schedule “J”, : Summary of Schedules, Statistical Summary of Certain Liabilities, Declaration Concerning Debtor’s Schedules, Statement of Financial Affairs, Certification of Notice to Consumer Debtor Under §342(b) of the Bankruptcy Code, Chapter 13 Statement of Current Monthly Income and Calculation of Commitment Period, Chapter 13 Calculation of Your Disposable Income, Notice to Consumer Debtor Under §342(b) of the Bankruptcy Code, Chapter 13 Plan and Proof of Income.

2 On April 9, 2015, this Court granted an Order extending the Debtor’s time to file the above-mentioned schedules through and including April 21, 2015.

3. Due to an extreme breakdown of communication by and between the Debtor and Berger, Fischoff and Shumer, LLP, on April 20, 2015 a motion was made to relieve Berger, Fischoff and Shumer, LLP as counsel to Debtor. The motion is returnable on May 19, 2015 at 9:30 a.m.

4. Accordingly, it is necessary that this motion be made asking for a further extension of time to file the Debtor’s Schedule “B”, Schedule “C”, Schedule “G”, Schedule “H”,

Schedule "I", Schedule "J", : Summary of Schedules, Statistical Summary of Certain Liabilities, Declaration Concerning Debtor's Schedules, Statement of Financial Affairs, Certification of Notice to Consumer Debtor Under §342(b) of the Bankruptcy Code, Chapter 13 Statement of Current Monthly Income and Calculation of Commitment Period, Chapter 13 Calculation of Your Disposable Income, Notice to Consumer Debtor Under §342(b) of the Bankruptcy Code, Chapter 13 Plan and Proof of Income from April 21, 2015 to a date after May 19, 2015.

WHEREFORE, your affiant, respectfully requests this Court enter an order pursuant to Rules 1014, 1007(c), 3015(b) and 9006(b) of the Federal Rules of Bankruptcy Procedure extending the debtor's time to file her Schedule "B", Schedule "C", Schedule "G", Schedule "H", Schedule "I", Schedule "J", : Summary of Schedules, Statistical Summary of Certain Liabilities, Declaration Concerning Debtor's Schedules, Statement of Financial Affairs, Certification of Notice to Consumer Debtor Under §342(b) of the Bankruptcy Code, Chapter 13 Statement of Current Monthly Income and Calculation of Commitment Period, Chapter 13 Calculation of Your Disposable Income, Notice to Consumer Debtor Under §342(b) of the Bankruptcy Code, Chapter 13 Plan and Proof of Income from April 13, 2015 to May 13, 2015, together with such other, further and different relief as this Court deems just, proper and equitable.

Dated: Woodbury, New York  
April 21, 2015

BERGER, FISCHOFF & SHUMER, LLP  
Attorneys for Debtor  
40 Crossways Park Drive  
Woodbury, NY 11797  
(516) 747-1136

---

By: Gary C. Fischoff, Esq.